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Dees v. Moss Point Baptist Church, 17 So. 1 (Miss.); *Waller v. Howell*, 20 Misc. 236, 45 N. Y. Supp. 790. When property rights are involved, however, the courts will inquire whether the expulsion was the act of the proper authorities. *Bouldin v. Alexander*, 15 Wall. (U. S.) 131. But if there is a right of appeal to a higher ecclesiastical authority, the courts will not give relief until that right has been exhausted. *German Reformed Church v. Commonwealth*, 3 Pa. St. 282. See *McGuire v. Trustees of St. Patrick's Cathedral*, 54 Hun 207, 220, 7 N. Y. Supp. 345, 351. Nor will the courts interfere when a member is expelled in accordance with the rules of the church, by which, on becoming a member, he agreed to be bound. *Grosvenor v. United Society of Believers*, 118 Mass. 78. On all these grounds, the court in the principal case rightly refused to give damages for the expulsion. Again, it is well settled that words spoken in the course of church discipline in the presence of the members of the church, are not actionable. *Fitzgerald v. Robinson*, 112 Mass. 371; *Farnsworth v. Storrs*, 5 Cush. (Mass.) 412, 416. By the better view, the protection arises from a conditional privilege, based on the common duty and interest of the members, and is forfeited if malice is shown. See *Jarvis v. Hatheway*, 3 Johns. (N. Y.) 180; cf. *Konkle v. Haven*, 140 Mich. 472, 478, 103 N. W. 850, 852.

WAREHOUSEMEN — UNIFORM WAREHOUSE RECEIPTS ACT — WRONGFUL PLEDGE OF WAREHOUSE RECEIPTS TO INNOCENT PLEDGEE. — In a state where the Uniform Warehouse Receipts Act was in force, X. pledged bills of lading to the A. bank, withdrew the bills on trust receipts, and obtained the goods, which he stored, taking negotiable warehouse receipts. These receipts X. pledged to the B. bank, and later withdrew them on trust receipts. X. became bankrupt. The B. bank petitioned for the recovery of the goods from the trustee in bankruptcy, and the A. bank put in a cross claim, urging that the act should be construed in the light of the former law of the state, by which it was entitled to the property. *Held*, that the B. bank is entitled to the goods, the Uniform Act being construed liberally to secure uniformity of law. *Commercial National Bank of New Orleans v. Canal-Louisiana Bank & Trust Co.*, Sup. Ct. Off., No. 117.

For a discussion of the construction of Uniform Acts, see NOTES, p. 541.

BOOK REVIEWS

GUIDE TO THE LAW AND LEGAL LITERATURE OF SPAIN. By Thomas W. Palmer, Jr. Washington: Government Printing Office. 1915. pp. 174.

This book deals with an important part of one of the most important movements now current. The movement is the attempt to teach the people of one country something about the views and institutions of other countries; and the part of that movement with which this book has to do is the attempt to enable the lawyers of the United States to learn something about the system lying at the basis of the law of Latin America.

Several years ago the Library of Congress began to publish a series of handbooks on foreign law. The plan was elaborated by Mr. Edwin M. Borchard, Librarian of the Supreme Court, and the volume on German law was prepared by him. The present volume follows Mr. Borchard's plan and was prepared under his supervision. The author, Mr. Thomas W. Palmer, Jr., a graduate of the Harvard Law School in the class of 1913, held a Sheldon fellowship from Harvard University in 1913-1914; and this is the fruit of his work while holding the fellowship. The details were collected and arranged by Mr. Palmer in the Supreme Court Library and at the University of Madrid.